

**JK Joey Kimbrough**  
Fwd: Plaintiff's first set of interrogatories, requests for production and admissions  
To: David D. Switzler, Cc: Stephen J. Newman, Adam R Hoock

June 13, 2023 at 8:08 AM  
[Details](#)

Mr. Switzler,  
As you can see from the previous exchange I believe AMEX had been served with Plaintiff's First Set of Interrogatories, Request for Production of Documents, and Admissions a tick over 30 days ago.  
Prior to my filing of a Motion to Compel Discovery, since communication has been "re-established" with yourself, I wanted to give your team the opportunity to answer. Your thoughts?  
As always please feel free to call if discussion is needed.  
Best Regards,  
Joey  
Sent from my iPhone

**JK joey kimbrough**  
Rogs and associated exhibits  
To: David D. Switzler, Cc: Stephen J. Newman, Adam R Hoock

June 13, 2023 at 10:47 AM  
[Details](#)

Mr. Switzler,  
Thanks for the call this morning and conversation around my previous service of Interrogatories, requests, admission as sent to AMEX.  
Please see attached all docs that we discussed. As always if you should have any questions please do not hesitate to call my cell.  
Best Regards,  
Joey

**JK joey kimbrough**  
Re: Rogs and associated exhibits  
To: David D. Switzler, Cc: Stephen J. Newman, Adam R Hoock

June 13, 2023 at 11:22 AM  
[Details](#)

Mr. Switzler,  
I was unable to attach the docs directly to the email due to size. The iCloud links was the only option that would allow the submission of the docs. As an alternative as was discussed is the dropbox link:  
<https://www.dropbox.com/scl/fi/o75k3gcxymf75sqdtebw/h?dl=0&rlkey=s4xfuqzgt45lihowb531cnygk>  
Regards,  
Joey

On Jun 13, 2023, at 11:29 AM, Switzler, David D. <[dswitzler@stroock.com](mailto:dswitzler@stroock.com)> wrote:

As Steve and I mentioned, we cannot readily access dropbox links. And the iCloud links are the same. Are you able to attach the requests themselves as we discussed this morning (you mentioned you had them as word documents, and I see the file size of the interrogatories you linked to is sufficiently small), sans exhibits, so that we might review the requests themselves and work with IT to arrange electronic delivery of the exhibits? Alternatively, would you be able to send them to my and Mr. Hoock's attention to the Miami office (address in my signature block below) in hard copy?

**David Switzler**  
Associate  
**STROOCK**  
2 S. Biscayne Boulevard, Suite 2300, Miami, FL 33131  
D: [305.789.9368](tel:3057899368)  
[dswitzler@stroock.com](mailto:dswitzler@stroock.com) | [vCard](#) | [www.stroock.com](http://www.stroock.com)

**JK Joey Kimbrough**  
Re: Rogs and associated exhibits  
To: David D. Switzler, Cc: Newman, Stephen J., Hoock, Adam R

June 13, 2023 at 12:34 PM  
[Details](#)

Yes sir on all points. Let me investigate sending through one file at a time. If we are unable to agree that all docs made it to you then I will absolutely send them all via snail mail.  
Regards,  
Joey  
Sent from my iPhone

**JK** joey kimbrough  
Email #1 - AMEX - Interrogatories, request for production, and admissions  
To: David D. Switzler, Cc: Stephen J. Newman, Adam R Hoock

Sent - Yahoo! June 13, 2023 at 1:45PM

[Details](#)

David,

Here are the Interrogatories, requests for production, and admissions sent separately (excluding exhibits). Exhibits will be sent in separate emails. Let's call this email #1.

Regards,  
Joey



5-11 ROGS to AMEX.pdf



**JK** joey kimbrough  
Email #2 - Exhibits A-E  
To: David D. Switzler, Cc: Stephen J. Newman, Adam R Hoock

Sent - Yahoo! June 13, 2023 at 1:49PM

[Details](#)

David,

Please find enclosed Exhibits A-E to correspond to the previously sent Interrogatories, Request for Production, and Admissions.

Regards,  
Joey



5-11 -Exhibits A-E.pdf



**JK** joey kimbrough  
Email #3 - Exhibits F-M  
To: David D. Switzler, Cc: Stephen J. Newman, Adam R Hoock

Sent - Yahoo! June 13, 2023 at 1:51PM

[Details](#)

David,

Please find enclosed Exhibits F-M to correspond to the previously sent Interrogatories, Request for Production, and Admissions.

Regards,  
Joey



5-11 - Exhibits F - M.pdf



**JK** joey kimbrough  
Email #4 - Exhibits N-S  
To: David D. Switzler, Cc: Stephen J. Newman, Adam R Hoock

Sent - Yahoo! June 13, 2023 at 1:52PM

[Details](#)

David,

Please find enclosed Exhibits N-S to correspond to the previously sent Interrogatories, Request for Production, and Admissions.

Regards,  
Joey



5-11 - Exhibits N - S.pdf



**JK** joey kimbrough  
Email #5 - Exhibits T-U  
To: David D. Switzler, Cc: Stephen J. Newman, Adam R Hoock

Sent - Yahoo! June 13, 2023 at 1:54PM

[Details](#)

David,

Please find enclosed Exhibits T-U to correspond to the previously sent Interrogatories, Request for Production, and Admissions.

Regards,



5-11 - Exhibits T - U.pdf



**JK** joey kimbrough  
Email #6 - Exhibits - Interrogatories in Support from previous case  
To: David D. Switzler, Cc: Stephen J. Newman, Adam R Hoock

Sent - Yahoo! June 13, 2023 at 1:57 PM

[Details](#)

David,

Please find enclosed Exhibits "Bob Hickman" and "Matt Whybrew" Rogs from previous case" to correspond to the previously sent Interrogatories, Request for Production, and Admissions.

Regards,  
Joey



5-11 - Discovery docs -  
B Hickman and Matt...



**JK** Joey Kimbrough  
Confirmation  
To: David D. Switzler, Cc: Stephen J. Newman, Adam R Hoock

June 13, 2023 at 3:32 PM

[Details](#)

David,

Please confirm that you received the service of ROGS/Request for Production/Admissions and supporting Exhibits (A-U and Hickman/Whybrew docs)?

Also, as stated on the phone you have my word that whatever time your team and AMEX needs to answering the pending Motion for Summary Judgment and recently sent ROGS will be approved on my end.

My suggestion is once you have had an opportunity confer with your client we submit an unopposed Motion for extension of time to the court showing that we are playing well together.

Thoughts?

Regards,  
Joey

Sent from my iPhone

**DS** David D. Switzler  
RE: Confirmation  
To: Joey Kimbrough, Cc: Newman, Stephen J., Hoock, Adam R

June 13, 2023 at 3:38 PM

[Details](#)

Thank you, Mr. Kimbrough. I am in receipt of six (6) numbered emails from you this afternoon, the first being a PDF that looks to be your Interrogatories, Requests for Production, and Requests for Admission, and the next five emails appear to attach the exhibits you described as being referred to in those requests. All attachments appear to open, and we will review and confirm completeness. I expect to be back in touch with you tomorrow. Thank you for sending these along.

**David Switzler**  
Associate

**STROOCK**  
2 S. Biscayne Boulevard, Suite 2300, Miami, FL 33131  
D: [305.789.9368](tel:305.789.9368)

[dswitzler@stroock.com](mailto:dswitzler@stroock.com) | [vCard](#) | [www.stroock.com](http://www.stroock.com)